

**UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF WISCONSIN**

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**J.J.**, by and through his next friend,  
Saleena Jackson; **K.D.**, by and through  
her next friends, John Levy and Meranda  
Davis; **C.M.**, by and through his next friend  
Toinette Ducksworth; **R.N.**, by and through  
his next friend Gloria Norwood, **M.S.**, by  
and through his next friend Jolene Waupekanay;  
**A.V.**, by and through his next friend Veronica  
Rocha-Montejano; **M.R.**, by and through his next  
friend Autumn Rodgers; **S.K.**, by and through her  
next friend, Thomas Korn; and **A.P.**, by and  
through her next friend, Louise Plaskey, for  
themselves and all others similarly situated,

Plaintiffs,

v.

**Case No.: 17-CV-47**

**JON E. LITSCHER**, in his official capacity  
as Secretary of the Wisconsin Department  
of Corrections; **JOHN D. PAQUIN**, in his  
official capacity as Administrator of  
Division of Juvenile Corrections of the  
Wisconsin Department of Corrections;  
**WENDY A. PETERSON** in her official capacity  
as Superintendent of the Lincoln Hills  
School for Boys and the Copper Lake  
School for Girls; **BRIAN GUSTKE**, in his official  
Capacity as Director of Security for the Lincoln  
Hills School for Boys and the Copper Lake  
School for Girls,

Defendants.

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**DECLARATION OF KARI BEIER**

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I, KARI BEIER, being first duly sworn upon oath, declare and state as follows:

1. I am in charge of recruiting for the State of Wisconsin Department of Corrections (“DOC”), including recruiting for staff at Lincoln Hills School for Boys (“LHS”) and Copper Lake School for Girls (“CLS”).

2. I make this declaration based on my own personal knowledge.

3. The DOC does not prioritize its recruiting and hiring qualified youth counselors based on their individual credentials. The DOC does not prioritize its recruiting process based on geography or race.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25<sup>th</sup> day of May, 2017.

By: s/ Kari Beier  
KARI BEIER